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Presentment Date: March 15, 2016 12:00 PMM
Objection Date: March 8, 2016

*Attorneys for Defendants Chalek Associates LLC;
Morton J. Chalek, In His Capacity As Managing
Member Of Chalek Associates LLC And As Trustee
For The Trust Of Doris Chalek; Trust of Doris Chalek,
In Its Capacity As A Member of Chalek Associates
LLC; Frances Reiss, In His/Her Capacity As A
Member of Chalek Associates LLC; Richard M.
Chalek, In His Capacity As A Member of Chalek
Associates LLC; David Chalek, In His Capacity As A
Member of Chalek Associates LLC; Isabel Chalek, In
Her Capacity As A Member of Chalek Associates LLC;
Mitchel Chalek, In His Capacity As A Member of
Chalek Associates LLC; Jessica Decker, In Her
Capacity As A Member of Chalek Associates LLC;
John Tzannes, In His Capacity As A Member of Chalek
Associates LLC; Peter Tzannes, In His Capacity As A
Member of Chalek Associates LLC; and Robin
Tzannes, In His/Her Capacity As A Member of Chalek
Associates LLC*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Adv. Pro. No. 10-04680 (SMB)

Plaintiff,

v.

CHALEK ASSOCIATES LLC, *et al.*,

Defendants.

NOTICE OF PRESENTMENT OF AN ORDER
GRANTING APPLICATION TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that, upon the annexed Declaration of Helen Davis Chaitman in Support of Application for an Order to Withdraw as Counsel, dated February 23, 2016, Chaitman LLP, attorney of record for Defendants Chalek Associates LLC; Morton J. Chalek, In His Capacity As Managing Member Of Chalek Associates LLC And As Trustee For The Trust Of Doris Chalek; Trust of Doris Chalek, In Its Capacity As A Member of Chalek Associates LLC; Frances Reiss, In His/Her Capacity As A Member of Chalek Associates LLC; Richard M. Chalek, In His Capacity As A Member of Chalek Associates LLC; David Chalek, In His Capacity As A Member of Chalek Associates LLC; Isabel Chalek, In Her Capacity As A Member of Chalek Associates LLC; Mitchel Chalek, In His Capacity As A Member of Chalek Associates LLC; Jessica Decker, In Her Capacity As A Member of Chalek Associates LLC; John Tzannes, In His Capacity As A Member of Chalek Associates LLC; Peter Tzannes, In His Capacity As A Member of Chalek Associates LLC; and Robin Tzannes, In His/Her Capacity As A Member of Chalek Associates LLC (the “Defendants”), will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature on March 15, 2016 at 12:00 PM.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, along with counsel to the Trustee, and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: February 23, 2016
New York, New York

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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Attorneys for Defendants Chalek Associates LLC; Morton J. Chalek, In His Capacity As Managing Member Of Chalek Associates LLC And As Trustee For The Trust Of Doris Chalek; Trust of Doris Chalek, In Its Capacity As A Member of Chalek Associates LLC; Frances Reiss, In His/Her Capacity As A Member of Chalek Associates LLC; Richard M. Chalek, In His Capacity As A Member of Chalek Associates LLC; David Chalek, In His Capacity As A Member of Chalek Associates LLC; Isabel Chalek, In Her Capacity As A Member of Chalek Associates LLC; Mitchel Chalek, In His Capacity As A Member of Chalek Associates LLC; Jessica Decker, In Her Capacity As A Member of Chalek Associates LLC; John Tzannes, In His Capacity As A Member of

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His Capacity As A Member of Chalek
Associates LLC; and Robin Tzannes, In
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Associates LLC*